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USDOC FOR 532/OEA/LLAUCIUS/JSONDERM USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR PATRICK SANTILLO BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: BMGT BEXP HK ETRD ETTC

SUBJECT: EXTRANCHECK: PRE-LICENSE CHECK: XIAN JIAOTONG UNIVERSITY

REF: A) BIS e-mail PLC request dated August 12, 2009 B) D421571

- 11. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.
- 12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO), attempted to conduct a pre-license check at Xian Jiaotong University, Unit E1, 6/F, Wang Kwong Industrial Building, 45 Tung To Road, Kwun Tong, Hong Kong (Jiaotong University). The purpose of the visit was to determine the suitability of Jiaotong University to be the ultimate consignee and end user of a non-contact linear displacement measuring system that is the subject of export license application D421571. The item (ECCN 2B006) is controlled for national security (NS) and nuclear nonproliferation (NP) reasons. The license applicant is Kaman Aerospace Corporation of Middletown, Connecticut.
- $\P 3$. A search of the Hong Kong Companies Registry revealed no entry for Jiaotong University.
- 14. Background research on the web did not uncover any web presence for Jiaotong University in Hong Kong although Xian Jiaotong University is a large university in Xian, mainland China (www.xjtu.edu.cn).
- 15. On August 12, 2009, FCS Commercial Assistant Carrie Chan called the contact number provided by OEA to arrange a meeting. A Mr. Sun answered the phone and stated that he knew nothing of the order in question. He stated that his company, Top Faith Logistics Ltd., is merely a logistics provider and not a trading company. Later, Mr. Sun called again to state that information about the order could be obtained from a Mr. Jia at phone number 13682619102 in Mainland China. Mr. Sun refused to request that Mr. Jia call the ECO to arrange a meeting in Hong Kong. ECO surmises that Mr. Jia works for Zhenshangyou Technology Company, listed as the foreign purchaser on licensing information provided by OEA. Consistent with standard ECO practice, no calls were made directly to mainland China to attempt to arrange a meeting with Mr. Jia.
- 16. According to the Hong Kong Companies Registry, Top Faith Logistics Ltd. was registered in May 2006 and its registered office is located at the Wang Kwong Industrial Building address noted above. Top Faith's director is listed as Sun, Hai Feng and its paid up share capital is listed as the Hong Kong equivalent of USD 1250. Mr. Sun also appears to be the director of Hong Kong registered company Shenzhen Weikang Electronic Co. Limited. A Shenzhen mirror company (Weikang Electronic Co. Limited) appears to produce printed circuit boards (www.wkpcba.com.cn).
- 17. Based on the information detailed herein, ECO believes Jiatong University in Hong Kong is not the ultimate consignee or end user for this item. ECO recommends a close review of all shipments to the Wang Kwong Industrial Building address noted above as well as any

shipments to Top Faith Logistics Limited and Shenzhen Weikang Electronic Co. Limited.

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